

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA, )  
                                  )  
Plaintiff,                   )  
                                  )  
v.                            )      **Case No. 18-CR-251-CVE**  
                                  )  
CHRISTOPHER R. PARKS,      )  
GARY ROBERT LEE,            )  
JERRY MAY KEEPERS,         )  
KRISHNA BALARMA PARCHURI )  
                                  )  
Defendants.                  )

**MOTION FOR LEAVE TO DISMISS WITHOUT PREJUDICE**

Pursuant to Rule 48(a), Federal Rules of Criminal Procedure, the United States hereby moves the Court for leave to dismiss without prejudice Counts One and Twenty-five through Thirty-three of the Superseding Indictment (Dkt. #48) filed against defendant, **KRISHNA BALARMA PARCHURI**, in the above-styled cause. In support of its motion, the government advises as follows:

1.     Counsel for the United States consulted with defense counsel, Paul DeMuro, and he has no objection to the United States' motion.
2.     The government requests leave to dismiss without prejudice Counts One and Twenty-five through Thirty-three of the Superseding Indictment defendant, **KRISHNA BALARMA PARCHURI** in the interest of justice.

WHEREFORE, premises considered, plaintiff prays that the instant motion be granted, and for all other proper relief.

Respectfully submitted,

R. TRENT SHORES  
UNITED STATES ATTORNEY

/s/ Melody N. Nelson

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**CERTIFICATE OF SERVICE**

I certify that on August 17, 2020, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Tom Wright  
Joe W. Bailey  
Keith Allen Ward  
Martin Gambill Hart  
Michael James King  
Michael J. Hinton  
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Patrick S. Coffey  
Paul Demuro  
Counsel for Defendants

/s/ Melody N. Nelson

Melody N. Nelson  
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